

Williams · Bradbury

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IDAHO PUBLIC
UTILITIES COMMISSION

February 19, 2015

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

Re: PAC-E-15-01

Dear Ms. Jewell:

Enclosed please find the original and seven copies of Petition of PacifiCorp Idaho Industrial Customers ("PIIC") for Leave to Intervene for filing in the above referenced docket.

Please call should you have any questions.

Sincerely,



Ronald L. Williams

RLW/jr
Enclosures
cc: Service List

Ronald L. Williams, ISB No. 3034
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Attorneys for PIIC

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	Case No. PAC-E-15-01
OF ROCKY MOUNTAIN POWER FOR)	
AUTHORITY TO INCREASE RATES BY)	PETITION OF PACIFICORP IDAHO
\$10.7 MILLION TO RECOVER DEFERRED)	INDUSTRIAL CUSTOMERS
NET POWER COSTS THROUGH THE)	FOR LEAVE TO INTERVENE
ENERGY COST ADJUSTMENT)	
MECHANISM (ECAM))	
_____)	

Pursuant to Rules 71 and 73 of the Idaho Public Utilities Commission's Rules of Practice and Procedure, IDAPA 31.01.01. 071 *et. seq.*, PacifiCorp Idaho Industrial Customers ("PIIC") petitions the Idaho Public Utilities Commission (the "Commission") for leave to intervene. In support of this Petition, PIIC states as follows:

1. The name and address of PIIC is:

PacifiCorp Idaho Industrial Customers
c/o Jim Duke, President
Idahoan Foods
357 Constitution Way
Idaho Falls, ID 83742

2. PIIC will be represented in this proceeding by Williams Bradbury, P.C.

All documents relating to these proceedings should be served on the following persons at the addresses listed:

Ronald L. Williams
Williams Bradbury, P.C.
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Val Steiner
Agrium Us Inc./Nu-West Industries
3010 Conda Rd
Soda Springs, ID, 83276-5301
E-mail: val.steiner@agrium.com

Jim Duke
Idahoan Foods
357 Constitution Way
Idaho Falls, ID 83742
E-mail: jduke@idahoan.com

3. PIIC is a coalition of Idaho companies that are industrial and commercial customers of Rocky Mountain Power ("RMP"). According to RMP's application in this proceeding, RMP is seeking an ECAM rate increase for commercial and industrial members of PIIC ranging between 1.7 percent and 2.6 percent, and an 8 percent rate increase for Agrium/Nu-West Industries.

4. PIIC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with these proceedings. PIIC intends to participate in all

respects of this proceeding and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

5. Without the opportunity to intervene herein, PIIC would be without a manner or means of participating in the lawful determination of issues which will result in affecting the rates for electric service to the PIIC members.

WHEREFORE, PIIC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate, and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 19 day of February, 2015.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Ronald L. Williams", written in dark ink.

Ronald L. Williams
Williams Bradbury, P.C.
Attorneys for PIIC

CERTIFICATE OF DELIVERY

I HEREBY CERTIFY that on this 19 day of February, 2015, I caused to be served a true and correct copy of the foregoing document upon the following individuals in the manner indicated below:

Ted Weston
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
E-Mail: ted.weston@pacificorp.com

- ☐ Hand Delivery
- ☐ US Mail (postage prepaid)
- ☐ Facsimile Transmission
- ☐ Federal Express
- ☒ Electronic Transmission

Yvonne Hogle
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- ☐ Federal Express
- ☒ Electronic Transmission

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Attorney for **Monsanto Company**

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Brubaker & Associates
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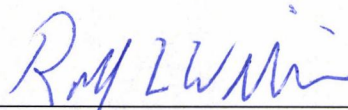
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Ronald L. Williams